CONSENT TO EXTEND THE TIME TO ASSESS CIVIL PENALTIES PROVIDED BY 31 U.S.C. § 5321 FOR FBAR VIOLATIONS

WHEREAS, the parties to this agreement desire to extend the time during which the penalties provided by 31 U.S.C. 5321 may be assessed and collected,

Alexandru Bit	(name and taxpaver identification number)	
Halland Okata a		
United States persor	1, 0 (address)	
and the Commission	er of the Internal Revenue Service, hereby agree and c	onsent to the following:
(1) For violation	ons with respect to the requirement, established under 3 to report having a financial interest in or signature auth	31 U.S.C. 5314, for a
over a financial accor	unt during the calendar years ending December 31, 2007	orny, or other authorny,
ending December 31, 2007		naintained with a
	cated in a foreign country, the amount of any penalty pro	ovided by 31 U.S.C.
321 may be assesse	ed at any time on or before December 31, 2018.	
	ed at any time on or before December 31, 2016.	
(2) This conse	ent does not reduce, waive, or extend any period of limit	ation under 26 U.S.C.
(2) This conse		r amend any other
(2) This conse 501 for assessing or greement between t	ent does not reduce, waive, or extend any period of limit r collecting tax. This consent also does not supersede on the United States person and the Internal Revenue Serv	r amend any other ice.
(2) This consection (2) This consection (2) This consection (2) This consent (2)	ent does not reduce, waive, or extend any period of limits recollecting tax. This consent also does not supersede on the United States person and the Internal Revenue Services not serve to shorten the statutory period of time to	r amend any other ice.
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